

Exhibit 43

Robert Klugman – January 28, 2021

Page 1

4 IN RE:

5 CUSTOMS AND TAX ADMINISTRATION OF
THE KINGDOM OF DENMARK
6 (SKATTEFORVALTNINGEN) TAX REFUND
SCHEME LITIGATION

8 This document relates to case nos.
19-cv-01783; 19-cv-01788; 19-cv-01792;
19-cv-01798; 19-cv-01918

10

11

12

13

14 REMOTE VTC VIDEOTAPED DEPOSITION UNDER ORAL
15 EXAMINATION OF
16 ROBERT KLUGMAN

17 DATE: January 28, 2021

18

17

20

114

25

20

REPORTED BY: MICHAEL FRIEDMAN, CCR

Robert Klugman – January 28, 2021

Page 13

1 R O B E R T K L U G M A N ,
2 called as a witness, having been first
3 duly sworn according to law, testifies as follows:
4
5

6 EXAMINATION BY MR. MAGUIRE:

7 Q Good morning, Mr. Klugman?

8 A Good morning.

9 Q So I'm Bill Maguire and I represent
10 the plaintiff who I'm going to call SKAT.
11 And I will ask you questions today.

12 We need a clear record, so could I
13 ask you, please, if there's any question that
14 I ask you that you don't understand, please
15 let me know and give me a chance to fix the
16 question.

17 A Okay. Just one question before we
18 start. Your audio is a little -- I don't
19 know if I'm the only person to hear the
20 audio.

21 It's a little fuzzy compared to the
22 other two previous speakers.

23 Q I will move a little closer.

24 Is that a little better?

25 A A little better, yes.

Robert Klugman – January 28, 2021

Page 65

1 going forward.

2 Q So that was just after -- same
3 month, but later in the month, as the first
4 trades that were done in early August.

5 Was there any discussion about
6 those trades?

7 A Not that I recall. It's certainly
8 possible that that would have been covered.

9 Q And what do you recall about that,
10 the discussion of trades going forward?

11 A I don't remember specifically. It
12 was just, I think, we -- we may have
13 confirmed that the profit split. But other
14 than that, I don't really recall anything
15 specifically.

16 Q And what was the profit split?

17 A That he was going to get 75 percent
18 of the reclaims.

19 Q And then the remaining 25 percent
20 would be split among the other participants?

21 A Yes.

22 Q Was there any discussion of the
23 expectation of the return, what the hundred
24 percent, what that would be?

25 A I don't recall that overall level